

# The Anglican Church of Australia Diocese of Wangaratta

## **Privacy Policy**

## ADOPTED WADCorp 14/12/2017

### Introduction

This policy is intended to:

- encourage sensitivity and appropriate respect for individuals in the collection and use of information for Church purposes.
- provide formal guidelines for the Diocese and Parishes to ensure protection of people's privacy in accordance with the Australian Privacy Principles.
- encourage open and transparent management of personal information which aligns to the principles of the Diocese's Safe Church Policy.

## The scope of our policy

The Privacy Policy applies to all church leaders/workers, parish members, volunteers and contractors associated with the Diocese of Wangaratta or ministry units within the Diocese

## Responsibility

The Corporation of the Diocese of Wangaratta is responsible for implementation and review of this policy.

## **Protection of Privacy**

## Collection

It is usual for the Parish Councils and the Diocese to collect personal information about Church members and potential Church members including their religious practices. In addition it is usual for the Diocese and Parish Councils to collect information from service providers, contractors and agents. It is important that the collection of personal information is fair, lawful and not intrusive. A person must be told the name of our organisation, the purpose of collection, how to get access to their personal information and what happens if the person chooses not to give the information.

#### Use and disclosure

In relation to Church Members or potential Church members it would be usual to collect from such individual, the individual's name, contact details, date of birth and history of Church membership. In relation to individuals acting as service providers, contractors or agents of the Diocese or of a Parish Council it would be usual to collect from such individual the individual's name, contact details and relevant information concerning that individual's dealings with the Diocese or Parish Council. Information should only be disclosed for the purpose it was collected (primary purpose) unless the person concerned has consented, or a secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure. A normal secondary purpose is communication about our activities, funding needs and philosophies.

## Data quality

Reasonable steps must be taken to ensure that the personal information collected, used or disclosed is accurate, complete and up-to-date.

#### Data security

Reasonable steps should be taken to protect the personal information held from misuse, loss and from unauthorised access, modification or disclosure.

#### **Openness**

A Privacy Policy information statement should be available outlining the information handling practices of the Diocese and Parish Councils and made available to anyone who asks for it.

#### Access and correction

An individual has the right to access the personal information held by the Diocese or Parish Council about them. Unless exempted from doing so by law, individuals should be permitted access to their own records. It is intended that any request for such access be made through the Parish Rector or Office of the Diocesan Registrar.

## **Identifiers**

Identifiers that have been assigned by a Commonwealth Government agency (e.g. Tax File Number, Medicare number, Pension number etc.) should not be obtained, used or disclosed except where required by law (e.g. in the case of a Contractor – ABN No. or where funds are invested with the Diocese – TFN No.).

## **Anonymity**

Individuals should be given the option to interact with the Diocese or a Parish Council anonymously whenever it is lawful and practicable to do so.

#### Transborder data flows

The Diocese and Parish Councils should only transfer personal information to a recipient in a foreign country in circumstances where the information will have the appropriate protection.

#### Sensitive information

Sensitive information will not be collected unless a person has consented to its collection, it is required by law, or the collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any other individual.

## Acknowledgement

This policy has been adapted from one developed by the Anglican Diocese of Bendigo. We thank them for sharing their work with us.

## **Related documents**

- Policies and Guidelines:
  - Safe Church Policy
  - Communication Policy
  - Privacy Statement (Safe Church)
  - o Electronic Communication Guidelines
  - Lay Authorisation Guidelines
  - o Risk Management Policy
- Resources
  - o Duty of Care Handbook *Melbourne*
  - o Parental Consent Form
  - o Photographic Images and Recording Consent Form
- Legislation and associated protocols / guides Internal
  - o Parish Administration Act
  - Episcopal Standards Act
  - o Professional Standards Regulations 2010
  - Professional Standards Amendment Act 2010
  - Power and Trust in the Church Melbourne
  - Protocol for complaints of misconduct against church volunteers (2013)
  - Clearance for Ministry protocol Melbourne
  - Faithfulness in Service General Synod
  - o Code of Good Practice
  - Other Codes of Conduct
- Legislation External
  - o https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles

## Distribution

- Registry staff
- Trustees
- All ministry units
- Licensed clergy
- Parish councils
- Clergy with Permission to Officiate
- Synod
- Director of Professional Standards
- Area Deans
- Archdeacons
- Director of Vocations
- Ordination candidates
- Recruitment material
- Induction material (clergy, paid staff and volunteers)
- Public, via the diocesan website

## **Review of this policy**

## This policy is scheduled for review in February 2018.

This policy will be reviewed every 12 months. The annual review process will provide an opportunity for staff, volunteers and members of the church community to contribute.

A review will also occur in the event that any incident arises that is in breach of this policy to identify if any aspects of the policy should be amended to make sure it remains relevant, accessible and effective.